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March 20, 2025

Hon. Valerie Figueredo
Magistrate Judge
United States District Court for the
Southern District of New York
500 Pearl Street
New York, N.Y. 10007-1312

Re: Mohamed John Akhtar et al. v. Eric Adams et al.
23-cv-06585 (JGLC) (VF)

Dear Magistrate Judge Figueredo,

I am in receipt of a letter-motion, dated March 19, 2025, filed by defendant Eric M. Eisenberg, and I offer this letter as my Response in Opposition. I have to appear on a criminal "trial ready matter" today and will be out of the office for most of the day, but I did want to get a response in this morning.

To the best of my recollection the documents, identified as "D.I." 126 and 129, were a response in which I indicated I had no objection to Your Honor's Report and Recommendation, and/or the Amended Order of 02/06/2025 (D.I. 121). There was no other substantive issue.

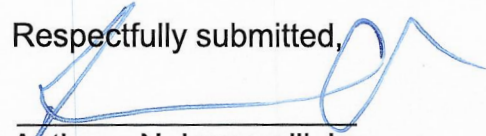
When directed to do a redaction of the date of birth, I searched my files and could only find one "PDF" document related to that issue. Because D.I. 126 and 129 were sealed, I did not have the benefit of making a comparison between the two documents. I do not recall specifically, but when told to refile, I may have "saved" one document over the other.

I did a diligent search of my files, and the only relevant document that I could find was the one I filed at D.I. 143. The point of the filing was to say there was no objection to the Amended Order, and to rebut defendant Eisenberg's position.

I endeavored to comply with Your Honor's directive to redact and refile immediately, which I thought I did. It is not clear to me what else Mr. Eisenberg is looking for? I deny any allegations of intentional misconduct.

In any case, whatever the Court directs I will comply with.

Respectfully submitted,


Anthony N. Iannarelli Jr.
Attorney for Plaintiffs

CC Via ECF

Ms. Kerri Devine, Esq.
Ms. Genan F. Zilkha
Assistant Corporation Counsels

Via Email

Mr. Eric Eisenberg, Esq.
Defendant *pro se*

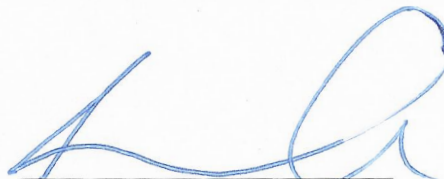
Affirmation of Anthony N. Iannarelli Jr.

Anthony N. Iannarelli J. of full age and attorney attorney for plaintiffs, affirms to the truth of the following:

1. I affirm, to the best of my knowledge, to the truth of the contents of my Letter Response in Opposition, dated March 20, 2025, which I incorporate by reference.
2. I also affirm that on March 20, 2025, I emailed a copy of this document herein to defendant Eric M. Eisenberg via email, and provided the same documents to Counsel for New York City Defendants via the Court's electronic filing.

I affirm to the truth of the above and am aware I can be subject to punishment for any statement knowingly made false,

Dated: March 20, 2024


Anthony N. Iannarelli Jr.

MEMO ENDORSED


HON. VALERIE FIGUEREDO
UNITED STATES MAGISTRATE JUDGE

Dated: 3/27/25

Plaintiffs were directed to file redacted versions of the sealed documents at ECF Nos. 126 and 129. ECF No. 140. The documents filed at ECF Nos. 126 and 129 are substantively the same. The only differences are minor textual differences, for example, in the dates on pages 1 and 24 of each document. On March 18, 2025, Plaintiff filed a redacted version of ECF No. 126. ECF No. 143. Because the documents at ECF Nos. 126 and 129 are substantively the same, Plaintiff's filing at ECF No. 143 satisfies Plaintiffs' obligation to file redacted versions of ECF Nos. 126 and 129. It is noted that the date on page 1 of ECF No. 143 should read "February 6, 2025," and the date on page 24 of ECF No. 143 should read "Feb18, 2025."